

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

WILLIAM MARTIN,

Plaintiff,

- v -

THE NEW YORK PUBLIC LIBRARY,
ZENA GEORGE, CHARMAINE
MCFARLANE, BEN SAPADIN,
TERRANCE NEAL, AND JESSICA
ROSENTHAL,

Defendants.

Civil Action No. 1:24-cv-07972

Removed from the Supreme Court of the
State of New York, County of Kings

State Court Index No. 525645/2024

**DECLARATION OF ATTORNEY
NICHOLAS M. REITER**

I, Nicholas M. Reiter, declare under penalty of perjury that the foregoing is true and correct:

1. I am an attorney licensed to practice law in the State of New York and a partner at Venable LLP. Venable LLP represents Defendants The New York Public Library,¹ Zena George, Charmaine McFarlane, Ben Sapadin, Terrance Neal, and Jessica Rosenthal (“Defendants”) in the above-captioned matter. I submit this declaration in support of Defendants’ Notice of Removal.

2. On September 23, 2024, Plaintiff William Martin (“Plaintiff”) commenced an action before the New York State Supreme Court, Kings County, Index No. 525645/2024, against each of the Defendants (the “State Court Action”).

3. The Summons with Notice in the State Court Action is attached as Exhibit A hereto.

4. The Verified Complaint in the State Court Action is attached as Exhibit B hereto.

5. The Proposed Order to Show Cause in the State Court Action is attached as Exhibit C hereto.

¹ Defendant The New York Public Library’s full and accurate name is The New York Public Library, Astor, Lenox and Tilden Foundations.

6. The Affidavit in Support of the Motion for Injunction in the State Court Action is attached as Exhibit D hereto.

7. The Request for Judicial Intervention re: the Order to Show Cause in the State Court Action is attached as Exhibit E hereto.

8. The Attorney Affirmation in Support of the Order to Show Cause for Injunction with TRO in the State Court Action is attached as Exhibit F hereto.

9. The Attorney Affirmation of 202.7(f) Notice to Show Cause for Injunction with TRO in the State Court Action is attached as Exhibit G hereto.

10. The Exhibit for FMLA Designation Notice in the State Court Action is attached as Exhibit H hereto.

11. The Exhibit for 202.7(f) Notice to The New York Public Library is attached as Exhibit I hereto.

12. The Signed Order to Show Cause in the State Court Action is attached as Exhibit J hereto.

13. The Stipulation to Waive Service of Process and of Extension of Time to Answer, Move, or Otherwise Respond to the Verified Complaint in the State Court Action is attached as Exhibit K hereto.

Dated: New York, New York
November 15, 2024



Nicholas M. Reiter